November 2021



The Welsh Parliament is the democratically elected body that represents the interests of Wales and its people. Commonly known as the Senedd, it makes laws for Wales, agrees Welsh taxes and holds the Welsh Government to account.

An electronic copy of this document can be found on the Senedd website: www.senedd.wales/SeneddLIC

Copies of this document can also be obtained in accessible formats including Braille, large print, audio or hard copy from:

Llywydd's Committee Welsh Parliament Cardiff Bay CF99 ISN

Tel: **0300 200 6565**

Email: SeneddLIC@senedd.wales

© Senedd Commission Copyright 2021

The text of this document may be reproduced free of charge in any format or medium providing that it is reproduced accurately and not used in a misleading or derogatory context. The material must be acknowledged as copyright of the Senedd Commission and the title of the document specified.

Llywydd's Committee

Scrutiny of the Electoral Commission's financial estimate for 2022-23 and five-year plan for 2022-23 to 2026-27, and annual report for 2020-21

November 2021



About the Committee

The Committee was established on 23 June 2021. Its remit can be found at: www.senedd.wales/SeneddLIC

Current Committee membership:



Committee Chair: David Rees MS Welsh Labour



Rhys ab Owen MSPlaid Cymru



Janet Finch-Saunders MS Welsh Conservatives



Peredur Owen Griffiths MS Plaid Cymru



Joyce Watson MSWelsh Labour

The following Member attended as a substitute during this inquiry.



Rhianon Passmore MSWelsh Labour

Contents

Cor	nclusions and Recommendations	5				
1.	Introduction6					
	Background context to the scrutiny of the Electoral Commission's financial est	imates				
		6				
	Requirements for Llywydd's Committee Annual Report	9				
2.	Scrutiny of the Electoral Commission's financial estimate for 2	022-				
23		10				
	Comparison with the financial estimate for 2021-22	10				
	Identifying costs attributable to the Welsh Consolidated Fund	11				
	Monitoring the time spent by staff on work in relation to devolved Welsh elec	tions				
		12				
	The impact of the COVID-19 pandemic	13				
	Responding to elections policy and the electoral reform agenda in Wales	15				
3.	The Electoral Commission's five-year plan for 2022/23 to 2026/27					
	••••••	18				
4.	The Committee's Annual Report for 2021-22	20				
	Scrutiny of the Electoral Commission's financial estimates	20				
	Consideration of the UK Government's Elections Bill	20				
Anr	nex A: The Financial Estimate for 2022-23	22				

Conclusions and Recommendations

1. Introduction

This report functions as both:

- the Llywydd's Committee's report on the Electoral Commission's financial estimates for 2022-23; and
- the annual report of the Llywydd's Committee for 2021-22.

Background context to the scrutiny of the Electoral Commission's financial estimates

- 1. The Electoral Commission's work on devolved Welsh elections and devolved Welsh referendums is paid for from the Welsh Consolidated Fund. The Senedd's Llywydd's Committee is responsible for scrutinising the amount of money requested for this purpose as set out in financial estimates submitted to the Committee each year by the Electoral Commission. The Llywydd's Committee is also responsible for scrutinising the Electoral Commission's five-year plans relating to its work on devolved Welsh elections and devolved Welsh referendums.
- **2.** The Senedd's Standing Orders 20.20A and 20.20B set out that:

"The Electoral Commission must submit an estimate of its income and expenditure that is attributable to the exercise of the its functions in relation to devolved Welsh elections and referendums, as required under paragraph 16A of Schedule 1 to the Political Parties, Elections and Referendums Act 2000, to the Llywydd's committee under SO 18B.2 as soon as reasonably practicable but no later than 1 October." (20.20A)

"The Llywydd's Committee must, having:

- i. consulted and taken into account any advice given to it by the Welsh Ministers, and;
- ii. had regard to any reports made to it by the Comptroller and Auditor
 General and to any recommendations contained in the reports;

consider and lay before the Senedd, no later than 22 November, a report including the estimate, with any modifications which the Committee, having consulted and taken into account any representations made by the Electoral Commission, considers appropriate." (20.20B)

- **3.** At certain times (i.e. following a Senedd election or at the request of the Llywydd's Committee ('the Committee')) the Electoral Commission ('the EC') must also submit to the Committee a five-year plan setting out the EC's aims and objectives relating to devolved Welsh elections and referendums in the ensuing five-year period.
- **4.** The Committee must scrutinise any estimates and plans submitted to it by the EC to ensure consistency with the economical, efficient and effective discharge by the EC of their functions in relation to devolved Welsh elections and devolved Welsh referendums.
- **5.** The Committee must modify the estimate or plan if the Committee is not satisfied with a financial estimate or five-year plan submitted to it by the EC.
- **6.** The estimate laid by the Committee in accordance with Standing Order 20.20B will then appear in the Annual Budget Motion, for agreement by the Senedd.²

Submission of the EC's financial estimate for 2022-23 and five-year plan for 2022-23 to 2026-27

- 7. The EC submitted its **financial estimate for 2022-23** and **five-year plan for Wales 2022/23 to 2026-27**³ to the Committee on 27 September 2021.
- **8.** The Committee met on 18 October 2021 to scrutinise the estimate and plan. The meeting was attended by the following representatives of the EC:
 - Professor Dame Elan Closs Stephens CBE (Electoral Commissioner for Wales)
 - Bob Posner (Chief Executive and Accounting Officer)
 - Kieran Rix (Finance Director)
 - Rhydian Thomas (Head of the Electoral Commission in Wales)

¹ Senedd, Standing Orders of the Welsh Parliament, Standing Orders 20.20A and 20.20B.

² See **Standing Order** 20 for an explanation of the Senedd's budget process.

³ The five-year plan submitted is the EC's Corporate Plan for Wales for 2022/23 to 2026/27.

- **9.** To assist the Committee with its scrutiny of the EC's estimates and plans, the Comptroller and Auditor General (CAG)⁴ must carry out an examination of the value for money with which the EC has used its resources in discharging its functions in relation to devolved Welsh elections and devolved Welsh referendums and submit a report on the examination to the Committee. A memorandum on how the Electoral Commission has managed its role in engaging young voters in the 2021 Senedd elections was submitted to the Committee by the CAG on 1 October 2021.⁵
- **10.** The Committee must consult the Welsh Ministers on any estimates and plans submitted to it by the EC and have regard to any advice provided by the Welsh Ministers before deciding if it is satisfied with the estimates and plans. The Committee shared the EC's estimate for 2022-23 and five-year plan with the Counsel General and Minister for the Constitution and also the Minister for Finance and Local Government on 27 September 2021. The Minister's advice was received on 5 October.⁶

Agreement of the Finance Committee's Statement of Principles

- **11.** The Senedd's Finance Committee has published a set of principles, known as the **Statement of Principles**, that it expects bodies funded directly from the Welsh Consolidated Fund to have regard to when making budget proposals e.g. that Budget requests should be set in the context of the long term financial funding situation in Wales and funding pressures in the wider public sector. The EC is one such body and was asked to adhere to these principles when preparing its financial estimate for 2022-23.
- **12.** On 11 October 2021 the Committee agreed to also adopt the Finance Committee's statement of principles, to underpin its scrutiny of the EC's financial estimates. The Committee also noted correspondence sent from the Minister for Finance and Local Government to the Finance Committee setting out various factors to inform future budget

⁴ The Comptroller and Auditor General (CAG) in the United Kingdom is the government official responsible for supervising the quality of public accounting and financial reporting. The CAG is an officer of the House of Commons who is the head of the National Audit Office, the body that scrutinises expenditure of government departments and other public sector bodies.

⁵ National Audit Office, **National Audit Office Memorandum: Progress in Engaging Young Voters in Wales**. 1 October 2021

⁶ Counsel General and Minister for the Constitution, <u>Letter from Counsel General and Minister for the Constitution</u>, 5 October 2021.

⁷ In addition, the Committee noted correspondence from the Minister for Finance and Local Government that was sent to the Finance

planning by Directly Funded Bodies, including the Government's best assessment of the level of funding available in future years.8

Requirements for Llywydd's Committee Annual Report

- **13.** Paragraph 20B of Schedule 1 to the Political Parties, Elections and Referendums Act 2000 also requires the Llywydd's Committee to report annually on the exercise of its functions.
- **14.** As noted above, this report also functions as the annual report of the Llywydd's Committee for 2021-22, which has been produced before the end of the financial year as the Committee does not anticipate exercising any further functions following publication of this report.
- **15.** A supplementary annual report will be produced in the event that the Committee undertakes consideration of other matters during the remainder of this financial year.

9

⁸ Minister for Finance and Local Government, Letter from Minister for Finance and Local Government, 2 August 2021.

2. Scrutiny of the Electoral Commission's financial estimate for 2022-23

This chapter summarises the Committee's scrutiny of the EC's financial estimate for 2022-23.

16. The total of the **estimate** submitted by the EC for the financial year 2022-23 was £1.419 million. This equates to an 18.9 per cent decrease compared with the estimate for 2021-22. The estimate is at Annex A.

Comparison with the financial estimate for 2021-22

- **17.** The EC has estimated that its total direct costs (pay and non-pay) for Wales will be £1.092 million, a 23.2% decrease from 2021-22. This accounts for most of the overall decrease in the 2022-23 estimate compared to 2021-22.
- **18.** When questioned on the decrease in direct costs the EC's Director of Finance and Corporate Services explained that:

"Our budgets wave with the electoral cycle, and, obviously, we've just had very large set of elections, and we're then coming up to the local governmental elections for which the expenditure's a bit lower, so that's a perfectly natural wave effect as we go through the electoral cycle."

- **19.** The Committee noted that, despite an overall decrease in costs, the budget line for direct costs of electoral administration for Wales 2022-23 had increased by £78,000 compared with the equivalent budget line in the Electoral Commission's financial estimates for 2021-22.¹⁰
- **20.** In subsequent correspondence, the Electoral Commission stated that the £78,000:

"refers to an increase in Wales staff time on overall proposed activity in the 2022-23 financial year including:

⁹ RoP, 18 October 2021, paragraph 44

¹⁰ In the Llywydd's Committee report on the Electoral Commission's financial estimates for 2021-22, the 'Wales' budget line of electoral administration direct costs was stated at £230,000. The equivalent line had risen to £308,000 in the estimates for 2022-23.

- The development of new Performance Standards for Returning Officers
- Supporting the potential legislative programme relating to Senedd and local government elections
- Increased work with external partners and stakeholder groups; and
- Welsh language awareness work and translation."11
- **21.** In addition, the estimates included £93,000 to cover the costs of two new staff roles (a Senior Comms Officer role and a Senior Policy Officer role).¹²
- **22.** In response to a question on this increase the Head of the Electoral Commission in Wales noted that:

"The direct costs are slightly higher due to what we now know, which we didn't know last year, relating to devolved Welsh activity. On reform, for example, we're all now aware that there'll be new work around reform of the Senedd, linked to the announcement a few weeks ago, and there'll be additional areas of work linked to next year's elections on electoral pilots, for example, as well as wider reform from Welsh Government. So, the budget really is intended to ensure that we can adequately resource that.

There's also additional activity relating to new voters and education...as well as new performance standards for returning officers that we're expecting to lay in December of next year, which has been brought forward. So, all of this will require relevant resource from across the Commission."13

Identifying costs attributable to the Welsh Consolidated Fund

23. The Committee considered how accurately the EC had been able to separate costs directly attributable to the regulation and support of devolved Welsh elections from other costs and whether the estimate for 2022-23 included any costs that should not be

¹¹ Electoral Commission, Response to follow up questions on the Electoral Commission's Financial Estimate, 28 October 2021.

¹² Officer costs stated in Electoral Commission, Response to follow up questions on the Electoral Commission's Financial Estimate, 28 October 2021.

¹³ RoP, 18 October 2021, paragraphs 47 & 48

attributable to the Welsh Consolidated Fund. The estimate for 2022-23 includes costs for "registration and reporting" including costs associated with the annual registration of party details, a function of the EC that is reserved to the UK Parliament.

24. On this issue the Director of Finance and Corporate Services stated that:

"A lot of the registration and reporting costs are about support for Rhydian [Head of the Electoral Commission in Wales] and his team when they're dealing with parties, rather than the actual process of doing the registration itself. So, it's only the devolved functions that would be charged to those budgets."

"The overwhelming majority is going to the UK budget, but Rhydian's team are involved in trying to support parties, giving advice and that sort of thing, as well as advice coming direct from the reporting and registration teams. From time to time, Rhydian's team need some support and help from the centre to undertake their work on this. Rhydian's team is a multi-functional team; it does all aspects of the Commission in Wales to at least some degree, so they need some support from our specialists from time to time, and that's what this represents. The actual process is being paid for elsewhere." 14

The Committee's view

25. The Committee is satisfied with the assurances provided by the EC that all direct costs included in the financial estimate for 2022-23 relate to the EC's work on devolved Welsh elections and should be attributable to the Welsh Consolidated Fund.

Monitoring the time spent by staff on work in relation to devolved Welsh elections

26. Responding to a question on what the Electoral Commission had learned from the costs incurred in preparation for the 2021 Senedd elections, the Head of the Electoral Commission in Wales stated that they:

"...met with every single team across the Commission on a number of occasions to determine what planned devolved activity fell into the financial year, in terms of staff time on specific projects.

.

¹⁴ RoP, 18 October 2021, paragraph 62

"...for example, with our monitoring team in London, one area of work was ending dual reporting for Members of the Senedd. So, we talked to them about what resource in terms of staff time was required to fund that specific activity. And we replicated that discussion with every single team across the organisation" 15

27. The EC's Director of Finance and Corporate Services added that:

"...what we're seeing is what we planned, and we didn't see any significant divergence from what we planned. So, while we don't keep a very detailed record of staff time, because it's not cost-effective, we are able to assure what we've seen"16

28. The EC assured the Committee that the methodology used to monitor staff time spent on work in relation to devolved Welsh elections has proved accurate and that the EC intended to keep its accuracy under review.

The Committee's view

29. The Committee acknowledges the complexity involved in estimating how staff split their time between different aspects of the Commission's work, in order to calculate costs for inclusion in the estimate. Whilst the methodology used appears thorough, the Committee agrees with the EC that the accuracy of staffing cost estimates should be frequently reviewed to ensure a robust and auditable monitoring system.

The impact of the COVID-19 pandemic

30. The EC's Chief Executive and Accounting Officer suggested that to date the pandemic had not placed a significant additional financial burden on the EC:

"...in practice, what happened in the elections we've just had, the Senedd elections, is that we were able to manage those extra costs as a Commission without extra funding. Clearly, that was a very different story for local authorities on the front line delivering the polls, but, for us, we were able to actually—to do our guidance and our approach generally, we didn't require extra funding. And when you look at our plan going

¹⁵ RoP, 18 October 2012, paragraph 24

¹⁶ RoP, 18 October 2021, paragraph 27

forward, we're planning on an assumption forward that, actually, we won't need to ask for extra funding."17

31. However, he added that:

"It is, of course, always possible if, for example, late in the day, in the runup to an election, there was a major change in Government policy in Wales and there was perhaps a need for a major public awareness campaign, or something like that, around COVID—. At that point in time, it is possible we would require extra funding but...that doesn't seem a reasonably foreseeable situation at the moment."¹⁸

32. The Head of the EC in Wales added that:

"We based the budget for this financial year on what we were expecting, and it was very difficult to try and answer the question as to what we were expecting, due to the pandemic...We were kept abreast of developments at every single opportunity, so that—you know, if changes were required, it was made clear to us that those changes would be adequately resourced by Welsh Government... we were able to deliver the elections as we had expected to do. There weren't any significant changes in terms of actually working." 19

33. The EC noted that their experience of not requiring additional funding in respect of the 2021 Senedd election to cover extra costs resulting from the pandemic had been reflected in the preparation of the financial estimate for 2022-23.

The Committee's view

34. The Committee acknowledges the work undertaken by the EC to ensure the that the 2021 Senedd elections were safely delivered in challenging conditions.

Recommendation 1. The EC should keep the Committee informed of any additional funding that may be required from the Welsh Consolidated Fund during the financial year 2022-23 to cover additional costs arising as a result of the pandemic.

¹⁷ RoP, 18 October 2021, paragraph 67

¹⁸ RoP, 18 October 2021, paragraph 67

¹⁹ RoP, 18 October 2021, paragraph 72

Responding to elections policy and the electoral reform agenda in Wales

35. Recent legislative reforms have lowered the voting age for Senedd and local government elections in Wales from 18 to 16. When asked about the EC's engagement with young people in relation to their voting rights the Head of the EC in Wales noted that:

"Ahead of the 2022 local government elections, we want to develop and extend the education programme that we've just started, building on the work that we've managed to undertake already. We want to engage with young people and educators across Wales. We're in the process, for example, of establishing a network of young people in Wales, who we hope will be able to actively inform our education work, to ensure that we're responding in the appropriate way that they would like us to." 20

36. This supports the commitment provided in the EC's five-year plan for Wales 2022/23 to 2026/27 that:

"Following the extension of the franchise to 16 and 17 year olds and foreign nationals resident in Wales, we will continue to work to ensure new voters understand their eligibility and can confidently participate in the 2022 local government elections and 2026 Senedd election.

We will also continue to work alongside all relevant partners to promote greater consistency in political education, and increase political knowledge and understanding amongst young people to ensure they can fully engage in our democratic system in Wales. This will include developing the good work already achieved with the publication of education resources and the further development of an education and learning programme in Wales."²¹

37. The Comptroller and Auditor General's **Memorandum** on "how the Electoral Commission has managed its role in engaging young voters in the 2021 Welsh elections" considered the Commission's strategy and objectives for raising awareness, registration and engagement in young people in the 2021 elections. The Memorandum concluded that:

²⁰ RoP, 18 October 2021, paragraph 100

²¹ Electoral Commission, Corporate Plan for Wales 2022/23 to 2026/27, p.14

²² Progress in engaging young voters in Wales – October 2021

"The Commission drew on existing work and lessons learned to help design its objectives. These objectives are clear and well-defined. The Commission also took appropriate action to help improve knowledge and clarity in the electoral process and address disconnection between voters and the election process."

38. It also noted that:

"The Commission had a target of generating at least 50,000 new voter applications in Wales over the duration of its campaign. It exceeded its target with final data showing 71,562 new voter applications, including 7,704 applications from 16-17-year-olds."²³

- **39.** Further electoral reform in Wales is anticipated in future. The Welsh Government's **Programme for Government for 2021-2026** includes a commitment to "Reform local government elections to reduce the democratic deficit."²⁴ Pilots are expected to be carried out during the 2022 local government elections in Wales as a means of trialling some such reforms.
- **40.** The same period may also see reforms to Senedd elections. Any such changes to local government and Senedd elections in Wales would have implications for the work of the EC.
- **41.** The Committee noted the Counsel General and Minister for the Constitution's advice on the financial estimate for 2022-23 which noted that:
 - "...the activities described by the Electoral Commission in the estimate and five-year plan are in line with the Welsh Government's expectations about what will be required during the periods these cover and the planned elections during that timeframe."²⁵
- **42.** The Head of the Electoral Commission in Wales stated that the exact nature of the electoral reform pilots to be carried out in 2022 are not yet known:

"What we don't know is the exact nature of the pilots: exactly how many authorities will be undertaking work, what the pilots will look like, what exactly will our evaluation of those pilots look like. So, we don't expect it

²³ National Audit Office, Progress in engaging young voters in Wales: The Electoral Commission, p.12

²⁴ Welsh Government, **Programme for Government for 2021-2026**

²⁵ Letter from Counsel General and Minister for the Constitution – 5 October 2021

to be anything that will require us to ask for a huge amount of additional money. Indeed, I think everything is there already. But it's very much dependent on what Welsh Government, and indeed the Senedd, looks to introduce."

The Committee's view

- **43.** The Committee acknowledges the work undertaken by the EC to respond to recent electoral reforms as highlighted by the Comptroller and Auditor General, to plan for future reforms and to ensure devolved Welsh elections are conducted effectively in light of such reforms.
- **44.** The Committee agrees with the EC that the Welsh Government should provide as soon as possible such details regarding pilots for the 2022 local government elections as are needed in order for electoral administrators and the EC to be able to plan effectively for their implementation.

Conclusion 1. The Committee is satisfied the financial estimate for 2022-23 is consistent with the economical, efficient and effective discharge by the EC of its functions in relation to devolved Welsh elections and devolved Welsh referendums.

3. The Electoral Commission's five-year plan for 2022/23 to 2026/27

This chapter summarises the Committee's scrutiny of the EC's five-year plan for 2022/23 to 2026/27.

- **45.** The EC submitted its new five-year plan for Wales 2022/23 to 2026/27 alongside its financial estimate for 2022-23. The five-year plan outlines the Commission's five strategic objectives for its work in relation to devolved Welsh elections:
 - Accessible registration and voting;
 - Transparent political campaigning and compliant political finance;
 - Resilient local electoral services;
 - Fair and effective electoral law;
 - A modern and sustainable electoral system.
- **46.** The Llywydd's Committee in the Fifth Senedd recommended that the EC's five-year plan should include as much detail as possible on how the EC's functions in relation to devolved Welsh elections and devolved Welsh referendums will be exercised during the period of the plan, including costs, timetables and milestones for this work.²⁶ The same committee also recommended "that the new five-year plan sets out performance measures specific to the discharge of the Electoral Commission's functions in relation to devolved Welsh elections and referendums."²⁷
- **47.** When questioned on the extent to which the performance measures included in the new five-year plan are specific to Wales the Chief Executive of the EC stated:

"There are ones in there about performance standards around local electoral services and so forth. Well, those will be very much targeted

²⁶ Llywydd's Committee, Scrutiny of the Electoral Commission's financial estimate for 2021-22 and five-year plan for 2020-21 to 2024-25, Recommendation 4, November 2020

²⁷ Llywydd's Committee, Scrutiny of the Electoral Commission's financial estimate for 2021-22 and five-year plan for 2020-21 to 2024-25, Recommendation 5, November 2020

around the Welsh local authorities, the Welsh returning officers and electoral registration officers, and so, in that sense, they are very Welsh orientated, and they will feel very different to other parts of the UK where there are different issues and different pressures on those local authorities."²⁸

- **48.** However he also acknowledged that "we are still fine-tuning and we're going to come back to what our precise targets are and what our stretch targets are".
- **49.** The Head of the EC in Wales added:

"...this is a starting point, that's what these KPIs are, and we want to hear from you and others as to how we can improve what's already in place." ²⁹

The Committee's view

- **50.** The five-year plan submitted last year was a UK-wide Corporate Plan for the EC. The Committee is pleased that the five-year plan submitted this year focuses more specifically to the EC's objectives for its work on devolved Welsh elections, as required by the paragraph 16B(2) to Schedule 1 of the Political Parties, Elections and Referendums Act 2000.
- **51.** Whilst acknowledging that some of the EC's UK-wide performance measures are as relevant to Wales as they are to other parts of the UK, additional performance measures that are specific to the EC's work in relation to devolved Welsh elections would be helpful in order to measure the success of such work (e.g the EC's engagement with young voters and foreign nationals in Wales).

Conclusion 2. The Committee is satisfied that the five-year plan submitted is consistent with the economical, efficient and effective discharge by the EC of its functions, which includes functions in relation to devolved Welsh elections and devolved Welsh referendums.

Recommendation 2. The EC should review the performance measures included in the new five-year plan to ensure they include measures which relate specifically to the objectives for its work on devolved Welsh elections.

Τ

²⁸ RoP, 18 October 2021, paragraph 121

²⁹ RoP, 18 October 2021, paragraph 122

4. The Committee's Annual Report for 2021-22

This chapter sets out the committee's annual report on the exercise of its functions.

Scrutiny of the Electoral Commission's financial estimates

- **52.** As of the date of this Report, the Committee had met twice and did not intend to meet again during the financial year 2021-22.
- **53.** It met on 11 October 2021 to receive a technical briefing on the Committee's functions, and prepare to deliver scrutiny on the Electoral Commission's financial estimates for 2021-22. It met on 18 October to undertake scrutiny of the Electoral Commission's financial estimates for 2021-22.
- **54.** The Committee's consideration of the Electoral Commission's financial estimates for 2021-22 is set out in the preceding chapters of this report.

Consideration of the UK Government's Elections Bill

- **55.** During its meetings on 11 and 18 October, the Committee also considered a letter from the UK Minister for the Constitution and Devolution concerning the UK Government's Elections Bill.³⁰ The letter originally sought the Llywydd's view on the UK Government's Elections Bill, but was subsequently referred to the Llywydd's Committee for consideration.
- **56.** The Committee noted that the Bill included provisions to allow the UK Government to issue Strategy and Policy Statements which could relate to the exercise of the Electoral Commission's devolved Welsh functions. On the basis that this appeared to create the risk of a conflict with the Llywydd's Committee's responsibilities in relation to the Electoral Commission's five-year plans, the Committee stated in a response³¹ that it would be appropriate for the Bill to be amended to require consultation with the Committee before issuing any such Statements. The Committee also noted that its correspondence did not

³⁰ Minister of State for the Constitution and Devolution, Letter from the UK Government Minister of State for the Constitution and Devolution, 5 July 2021.

³¹ Llywydd's Committee, **Letter to the Minister of State for Levelling Up and Equalities**, 18 October 2021.

pre-empt the Senedd's decision on consent for the Bill, given that various provisions in the Bill related to matters that were devolved to the Senedd.

Annex A: The Financial Estimate for 2022-23

Annual Estimate 2022-23: Electoral Commission, Wales			
Senedd Costs	2022-23 (£000s)	Commentary	
Direct Costs (pay and non-pa	y)		
Electoral Administration			
Wales	308	This represents the Committee's share of the costs of preparing for and supporting the delivery of the 2022 Local Government elections in Wales. This will include developing and delivering online guidance and providing resources for candidates and agents, Returning Officers/Electoral Registration Officers and electoral administrators. We will use our performance standards in our engagement with ROs/EROs to support and challenge them on their delivery of electoral events and activities. We will work closely with the electoral community in Wales through the various stakeholder groups we manage, for example the Wales Electoral Coordination Board and Senedd Parties Panel. We will work closely with the Welsh Government to provide advice and expert opinion as electoral reforms, such as pilots, are developed. The Wales team will also provide resource and support for projects being led outside of Wales (e.g. on ending dual reporting) but with a direct impact on devolved elections. We will continue to fulfil our statutory responsibility by meeting the Welsh Language Standards set by the Welsh Language Commissioner and will lead and support the wider Commission to ensure that our commitments to the Welsh Language are upheld.	

Support	47	This represents the Committee's share of the cost of monitoring and supporting the work of Returning Officers and Electoral Registration Officers in Wales for 2022-23, including redeveloping and consulting on a new set of performance standards for Returning Officers, to be laid at the Senedd during the financial year.
Guidance	44	This represents the Committee's share of the cost to support the Local Government Elections Wales 2022. We will provide advice in response to queries from Returning Officers/Electoral Registration Officers and electoral administrators throughout the year, but particularly before, during and after the election.
New resource for devolved elections	93	This represents the costs of two staff members who will be employed to support the delivery of the Welsh Government and Senedd's extensive programme of electoral reform - ensuring that this complex legislation is clear and workable - as well as furthering our education programme with voters, and in particular young people.
	492	
Legal		
Legal	115	This represents the Committee's share of the total cost of providing legal support to the Commission's advice, guidance and regulation functions and real-time legal advice before, during and after the 2022 Local Government elections in Wales. It also includes supporting post-poll regulation and the development of any policy recommendations as well as providing general and on-going legal advice on Welsh legislation and support of the Commission's functions as they relate to Wales (including registration, regulation, policy, electoral administration,

		governance, and compliance with Welsh Language Standards).
Regulation	1	
Registration & reporting	41	This represents the Committee's share of the costs for the work associated with the statutory reports required from political parties in Wales, such as quarterly donations and loans reports, annual registration of party details and annual Statement of Account submission. The Wales team provides support to parties through each of these processes and we publish the financial data associated with these submissions.
Monitoring & enforcement	39	This represents the Committee's share of the costs that are associated with compliance and enforcement work arising from parties and campaigners in Wales. Our monitoring work includes reviewing campaign activity, and carrying out enforcement work if required. The Commission works with regulated entities including parties, campaigners, candidates and elected members to ensure compliance with the rules in an effort to avoid having to take enforcement action. We also work closely with the Single Point of Contact (SPOC) within each Police Force area to provide advice and guidance during the election period. Our advice services are available to all regulated entities and stakeholders.
		As part of our monitoring and enforcement, we are working with Senedd officials to bring an end to dual reporting in Wales. Currently, MS' have to report certain donations and loans twice, to both the Senedd and to the Electoral Commission. Bringing dual reporting to an

		end, as has been the case in both Westminster and the Scottish Parliament, will relieve the administrative burden of elected members having to report the same donation or loan twice to two different bodies.
Regulatory support	30	This represents the Committee's share of the costs associated with developing spending, donations and post-poll reporting guidance for the 2022 Local Government elections in Wales. As part of this work, we provide candidates and agents with training sessions prior to elections, that take place at party conferences, local authority candidate sessions and bespoke Commission seminars, to ensure high levels of compliance with the rules.
		The Wales team also provides advice and guidance to candidates and agents prior to elections, which will include the 2022 Local Government elections in Wales, and we provide the same advice service to parties, campaigners and elected members year round.
Communication, policy & research	225	
Campaigns & Corp Identity	126	This represents the Committee's share of the costs of the Commission's campaigns team based on our estimate of how their time will be spent. We will run two public awareness campaigns ahead of the 2022 Local Government elections in Wales - our 'Got 5?' voter registration campaign and our 'Welcome to Your Vote' franchise campaign for 16/17 year olds. These costs cover working with our media buyer and social media advertising during two weeks of campaign activity in 2022-23, alongside collating data and completing a final evaluation report post-campaign. We will also undertake partnership work with a

		range of democratic and third sector organisations across Wales, encouraging them engage with our campaign, voter information and education materials to ensure they reach newly enfranchised, under-registered and disengaged groups.
Digital communication & learning	61	This represents the Committee's share of the costs of the Commission's digital communications and learning team based on our estimate of how their time will be spent. This covers building on our existing political literacy work by developing our education resources to cover more Wales specific content, taking into account the wider educational context in Wales including changes to the national curriculum in 2022; the extension of the franchise to 16-17 year olds and the 2022 Local Government elections in Wales. We will also undertake consultancy work with a variety of teachers, youth organisations and young people across Wales to get their feedback and input on our resources to ensure they are effective and fit for purpose.
External communications	59	This represents the Committee's share of the costs of the Commission's external communications team (press office and public affairs) based on our estimate of how their time will be spent. This covers handling reactive press and public affairs enquiries; carrying out proactive media engagement during our campaign period and for routine regulatory publications and Commission reports and preparing for meetings with Members of the Senedd. Press office and public affairs support will be increased for activity relating to the Welsh Government electoral reform agenda, such as pilots.

Research	67	This represents the Committee's share of the costs of the Commission's research team based on our estimate of how their time will be spent. This covers a programme of research around the 2022 Local Government elections in Wales likely to include; annual public attitudes surveying; data collection on accuracy and completeness of electoral registers, surveying of candidates and gathering feedback from EROs, ROs and electoral administrators.	
Policy	62	This represents the Committee's share of the costs of the Commission's policy team based on our estimate of how their time will be spent. This covers analysis and reporting on the 2022 Local Government elections in Wales to identify trends and issues for consideration by policymakers and drawing together evidence and analysis from across other parts of the UK and internationally to inform our positions on specific proposals from Welsh Government.	
	375		
Total direct Costs	1092		
Indirect Costs			
Resource	252	5% of back office costs, including rent, rates, ICT, finance, HR and management costs	
Depreciation	75	5% of the depreciation for capital expenditure, including upgrading of the Political finance and other systems	
	327		
Total indirect Costs	327		
Total contribution	1,419		